

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CYNTHIA JOHNSON, BRENDA BEZEREDI,
JAINE BIALK, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

THE BOEING COMPANY,

Defendant.

Case No. 2:19-cv-00597-RSM

**STIPULATED MOTION AND
ORDER TO STAY CASE**

The parties, by and through the undersigned counsel, hereby submit this Stipulated Motion to Stay Case. For good cause shown and consistent with the parties' representations in their July 26, 2019 Joint Status Report (Dkt. 21), the parties respectfully request that the case and all deadlines and motions be stayed because the parties have agreed to engage in early mediation.

The plaintiffs' motion for Rule 23 class certification is currently due on October 4, 2019. *See* Dkt. 22. The defendant's Motion to Dismiss is fully briefed and currently under the Court's consideration. *See* Dkt. 16, 19, 20. The defendants' deadline to respond to the plaintiffs' Motion for Conditional Certification is currently stayed pending the Court's decision on the Motion to Dismiss. *See* Dkt. 13, 15.

1 The parties are in the process of exploring dates for mediation and selecting a mediator;
2 they also anticipate engaging in an exchange of limited information, including payroll and
3 timekeeping data prior to any mediation session. The parties jointly agree that a stay of the case
4 and all deadlines and motions will permit the parties to engage in good faith settlement negotiations
5 in an attempt to resolve the case prior to incurring additional substantial attorneys' fees and costs.
6 The parties agree to advise the Court on or before January 31, 2020, as to whether the stay should
7 be extended to permit the parties to continue to work towards a potential resolution of this matter.

8 Accordingly, the parties jointly and respectfully request that the case and all deadlines and
9 motions be stayed until January 31, 2020, to enable the parties to engage in mediation.

1 Dated: October 1, 2019

/s/ Molly A. Elkin

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Attorneys for Defendant

1 **IT IS SO ORDERED.**

2 Dated this 1 day of October 2019.

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4 RICARDO S. MARTINEZ
5 CHIEF UNITED STATES DISTRICT JUDGE

6
7 Presented by:

8 /s/ Molly A. Elkin

9 Molly A. Elkin (*admitted pro hac vice*)
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